UNITED STATES DISTRICT COURT DISTRICT OF MINNESOTA Criminal No. 19-50(1) (ADM/TNL)

United States of America.

Plaintiff,

SUPPLEMENTAL MEMORANDUM IN SUPPORT OF MOTION TO

SUPPRESS THE FRUITS OF AN

ILLEGAL SEARCH AND SEIZURE

Johntez Leondis Randle,

VS.

Defendant.

Defendant, Johntez Randle, by and through his attorney, Thomas H. Shiah, Esq., has moved the Court to suppress various fruits of an illegal search and seizure. In an abundance of caution, Mr. Randle wishes to clarify that in addition to those fruits previously identified, the following are also subject to suppression as fruits of the violation of his Fourth Amendment rights:

• All cell phones and computers recovered from the search of Mr. Randle's person and his home, and all data recovered from examination of those devices.

Dated: October 7, 2019 Respectfully submitted,

S/Thomas H. Shiah
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ATTORNEY FOR DEFENDANT